

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DREW MACEWEN, ANDREW BARKIS,
CHRIS CORRY, BRANDON VICK, KELLY
CHAMBERS, MICHAEL MCKEE, FRAN
WILLS, BRUCE RUSSELL, Phil Fortunato,
Dave McMullan, Isaac Vellekamp, and Marcus
Torrey,

Plaintiffs,

v.

JAY INSLEE, in his official capacity as the
Governor of Washington,

Defendant.

No. 3:20-cv-05423

DECLARATION OF CHRIS CORRY

I, Chris Corry, make the following declaration under penalty of perjury:

1. I am a plaintiff in the above-entitled action and have personal knowledge of the facts stated herein.
2. I am a resident of Yakima County Washington, and elected state representative for the 14th Legislative District.
3. I also work as a salesman in Washington state.
4. I normally meet with clients and potential clients in person as part of my business.
5. I am prohibited from meeting with clients and potential clients in person as a result of the Proclamations.

- 1 6. Many of my clients and potential clients find remote meeting technology inadequate to their
- 2 needs.
- 3 7. I cannot make sales to my clients or potential clients without meeting with them.
- 4 8. I am unable to make sales as a result of the Proclamations.
- 5 9. But for the Proclamations, I would be able to make sales.
- 6 10. I am losing money every day due to the Proclamations.
- 7 11. I normally receive medical and dental care in Washington state.
- 8 12. My medical and dental health providers are closed as a result of the Proclamations.
- 9 13. But for the Proclamations, my medical and dental health providers would be open.
- 10 14. I am deprived of medical and dental care due to the Proclamations.
- 11 15. My children also live in Washington state.
- 12 16. My children also normally receive medical and dental care in Washington state.
- 13 17. My children's medical and dental health providers are closed as a result of the Proclamations.
- 14 18. But for the Proclamations, my children's medical and dental health providers would be open.
- 15 19. My children are deprived of medical and dental care due to the Proclamations.
- 16 20. My foster daughter wears dental braces.
- 17 21. My foster daughter's braces are currently faulty.
- 18 22. My foster daughter needs prompt dental attention in order to have her braces fixed.
- 19 23. Getting her braces fixed is among the medical and dental care that my foster daughter is unable
- 20 to receive due to the Proclamations.
- 21 24. My foster daughter is forced to wear faulty dental braces due to the Proclamations.
- 22 25. My children normally attend school in Washington state.
- 23 26. My children's schools are closed as a result of the Proclamations.
- 24 27. But for the Proclamations, my children's schools would be open.
- 25 28. My children are deprived of the ability to attend school due to the Proclamations.
- 26 29. The distance learning alternatives offered for my children are wholly inadequate.
- 27 30. My children are functionally being deprived of an education due to the Proclamations.

MACEWEN V. INSLEE

DECLARATION OF CHRIS CORRY - 2

No. 3:20-CV-05423

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1 31. My children also normally participate in sports and extramural activities in Washington state.

2 32. My children's sport and extramural activities are cancelled as a result of the Proclamations.

3 33. But for the Proclamations, my children's sport and extramural groups would be active.

4 34. My children are deprived of the ability to participate in sports and extramural activities due to
5 the Proclamations.

6 35. I normally attend church in Washington state.

7 36. I and my fellow congregants are Bible-believing Christians who are compelled, as a matter of
8 religious conscience, to "not forsak[e] the assembling of ourselves together" in physical,
9 corporate worship. Hebrews 10:25 (KJV).

10 37. My church is closed as a result of the Proclamations.

11 38. But for the Proclamations, my church would be open.

12 39. I am deprived of the ability to worship at church due to the Proclamations.

13 40. I am moreover deprived of the ability to fulfil a critical religious obligation due to the
14 Proclamations.

15 41. I am also deprived of the fellowship I normally enjoy at church due to the Proclamations.

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17 SIGNED, May 19, 2020, at Yakima _____, Washington.

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20 BY:  _____

21 CHRIS CORRY
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